

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHEAST DIVISION**

HEATHER WATTS,)
)
Plaintiff,)
)
vs.) **CIVIL ACTION NO.:**
) **2:06-cv-1149-MEF**
HOSPITALITY VENTURES, LLC,)
)
Defendant.)

PLAINTIFF'S EXHIBIT LIST FOR TRIAL

COMES Now, the plaintiff, by and through her attorney, and submits her list of exhibits for trial as follows:

1. Hospitality Ventures' personnel file of Plaintiff in its entirety, Bates No: MV 00017-00082.
2. The entire EEOC file of Heather Watts as produced by the EEOC, including, but not limited to, her charge of discrimination, defendant's position statement with exhibits and any document produced to the EEOC, Bates No: MV 00129-00177.
3. Policies and Procedures of Hospitality Ventures.
4. Any and all documents related to Plaintiff's employment with Hospitality Ventures.
5. Hospitality Ventures' Personnel Employment Policies and Procedures Handbook for the last 10 years.
6. Hospitality Ventures' Associate Handbook for the last 10 years, Bates No: MV

00083-00128.

7. Any personnel, human resource or department file on any witness listed on Plaintiff's and Defendant's witness list.
8. Personnel File of Tammy Dominguez, Bates No: MV 00178-00182.
9. Personnel File of Jennifer Middleton, Bates No: MV 00183-00198.
10. Personnel File of Tandi Mitchell, Bates No: MV 00200-00203.
11. GSS Property Pulse Reports From 2003-2007, Bates No: 00205-00233.
12. Executive Summaries From 2003-2007, Bates No: MV 00234-00272.
13. Sales Pro Sales Productivity for 2005, Bates No: MV 00273-00280.
14. Heather Watts' Sales Pro Sales Recaps With Details for 2005, Bates No: MV 00281-00338.
15. Sales Pro Sales Productivity for 2004, Bates No: MV 00339-00344.
16. Heather Watts' Sales Pro Sales Recaps With Details for 2004, Bates No: MV 00345-00351; 00353-00379; 00381-0455.
17. Statement of Income and Expenses Limited Service, Bates No: MV 00456-00457.
18. Sales Pro Sales Recap With Details for Tammy Dominguez 9/1/05-12/31/06, Bates No: MV 00458-00470.
19. Sales Pro Sales Recap With Details for Jennifer Middleton 9/1/05-12/31/06, Bates No: MV 00471-00504.
20. Fairfield Inn Re-licensing Franchise Agreement Between Marriott International, Inc. and Montgomery Ventures, LLC, Bates No: MV 00505-00544.
21. Franchise Information, Bates No: MV 00545-00565.

22. Secretary of State Documents, Bates No: 00566-00581.
23. Alabama Department of Revenue; Alabama Business Privilege Tax Return and Annual Report 2002, Bates No: 00582.
24. Condensed Employee Master, Bates No: 00583-00613.
25. Group Contract for Blue Cross Blue Shield for Hospitality Ventures, Bates No: MV 00614-00623.
26. Hospitality Ventures Workers' Compensation and Employees' Liability Insurance Information, Bates No: MV 00624-00640.
27. All e-mails produced by defendant on CD-ROM.
28. Job Summary, 00001-00002.
29. Quarterly Incentive Compensation Plan for Hotel Sales Department, 0003-0004.
30. 2005 1st Quarter Bonus Tracking Results for Heather, 0005-0016.
31. 2005 2nd Quarter Bonus Tracking Results for Heather, 0017-0027.
32. Heather's Statement of Earnings & Deductions Pay Period 10/30/05-11/04/05, 0028.
33. Unemployment Monetary Determination, 0029.
34. E-mail from Roger Miller to Heather Regarding Request for Schedule Adjustment and Salary Increased Dated April 7, 2005, 0030-0031.
35. 2005 3rd Quarter Bonus Tracking Results for Heather, 0032-0042.
36. E-mail from Roger Miller to Heather Regarding Annual Salary Increase Dated April 8, 2005, 0043.
37. E-mail from Roger Miller to Heather Regarding Cell Phone Reimbursement

Dated July 13, 2004, 0044.

38. E-mail from Roger Miller to Heather Regarding Insurance Dated August 27, 2004, 0045.
39. E-mail from Amrita Parekh Regarding Direct Deposit for Heather Dated May 17, 2005 and Note from Heather to Todd Epplin Regarding Same, 0046-0047.
40. Heather's Income Tax Return Documents, 0048-0080.
41. Letter to Todd Epplin from Heather Regarding Official Notice of Request of Maternity Leave Dated June 6, 2005, 0081-0082.
42. Doctor's Certificate for Heather Dated November 22, 2005, 0083.
43. Letter to Todd Epplin from Heather Regarding Official Notice of Request of Maternity Leave Dated June 6, 2005, 0084.
44. E-mails b/w Heather and Roger Miller Regarding Heather's Efforts and Tandi Mitchell, 0085-0088.
45. E-mail from Heather to Todd Epplin While on Maternity Leave Dated August 16, 2005, 0089.
46. E-mail from Heather to Roger Miller Updating Him Dated August 21, 2005, 0090.
47. E-mail b/w Heather, Amrita and Tammy Dominguez Regarding Heather's Hours and Tandi Dated August 29, 2005, 0091-0096.
48. E-mail from Heather to Roger Miller Regarding Return from Maternity Leave and Lack of Daycare Dated August 29, 2005, 0097.
49. E-mails b/w Heather, Roger, Amrita and Tammy Regarding Heather's Hours and Pay Check Dated August 29, 2005, 0098-0100.
50. E-mail b/w Heather and Tammy Regarding Tandi's Work Performance and Heather's Schedule Dated September 22, 2005, 0101-0103.

51. Sales Pro Activity Report for Heather, 0104-0105.
52. E-mails b/w Heather, Roger and Amrita Regarding Approval of Heather's Extra Hours Dated September 18, 2005, 0106-0107.
53. E-mail from Heather to Tammy Regarding Extension of Maternity Leave and Intent to Return to Work Afterwards Dated September 27, 2005, 0108.
54. E-mail from Heather to Roger Regarding Approval for Heather's 3rd Quarter Bonus Dated October 12, 2005, 0109-0110.
55. E-mails between Heather, Tandi, and Roger Regarding Group Books for the Week Dated October 13, 2005, 0111-0113.
56. E-mail from Heather to Tammy Regarding Bonus and Meeting on Marketing Plan Dated October 20, 2005, 0114-0115.
57. E-mail from Heather to Roger and Tammy Regarding Update on Marketing Plan Dated October 21, 2005, 0116-0117.
58. E-mails from Heather to Roger and Tammy Regarding Weekly Reports Dated October 24, 2005, 0118-0120.
59. E-mails from Heather to Tammy and Roger Regarding the Meeting, Completion of Items on Marketing Plan and Bonus Pay Dated October 27, 2005, 0121-0125.
60. Marriott Stone Mountain Inn Reservation Confirmation, 0126-0129.
61. E-mail from Roger Miller to Heather Regarding Orientation and Initial Sales Pro Entries Dated July 6, 2004, 0130.
62. E-mail from Roger Miller to Heather Regarding Star Report Dated July 8, 2004, 0130.
63. E-mails b/w Heather and Roger Regarding Schedule Proposal, 0132-0134.
64. E-mail from Roger Miller to Heather Regarding Star Report Dated July 28, 2004, 0135.

65. E-mail from Roger Miller to Heather Regarding Web Site Review Dated July 29, 2004, 0136.
66. E-mail from Roger Miller to Heather Regarding Web Site Dated August 27, 2004, 0137.
67. E-mails from Roger Miller to Heather Regarding Sales Productivity, 0138-0140.
68. E-mail from Roger Miller to Heather Regarding DOSM Update Dated November 2, 2004, 0141.
69. E-mails from Roger Miller and Robert Cole to Heather Regarding Sales Pro Breakdown, Activities, and Good Job Done, 0142-0160.
70. Letter from Tammy to Heather Regarding Front Desk Position or Night Shift Audit Position Dated November 6, 2005, 0161-0164.
71. Letter from Tammy to Heather with Cobra Paperwork, etc., 0165.
72. E-mail from Heather to Tammy Regarding Return of Company Items Dated November 9, 2005, 0166.
73. E-mail from Heather to Roger Miller Regarding Conversation with Tammy Dated November 3, 2005, 0167.
74. E-mails from Heather to Amrita and Carol Twardoch Regarding Cobra and Insurance Information Dated November 8, 2005, 0168-0169.
75. Hospitality Ventures LLC Associate Handbook for Hotel Personnel, 0170-0197.
76. Heather's Earnings Statements from Aspect Foundation, 0198-0200.
77. Oracle's Current Benefits List, 0201.
78. Taylor Road Enrollment Form for Tanner Watts, 0202-0204.

79. Montgomery Ventures Condensed Employee Master List, 0205-0220.
80. Sales/Marketing Summaries, 0221-0224.
81. Heather's Unemployment File, 0225-0251.
82. Medical Records from Central Alabama ENT Associates, 0252-0259.
83. Documents Received in Response to Subpoena to Partners in Pediatrics.
84. Documents Received in Response to Subpoena to OB-GYN Associates.
85. Any and all subpoenaed records from Plaintiff or Defendant.
86. Any and all medical records of Plaintiff relating to the claims of this case.
87. Any and all depositions and accompanying exhibits.
88. Plaintiff's Damage Exhibit for demonstrative purposes only.
89. Timeline chart of events referencing Plaintiff's employment with Defendant, Complaint of Discrimination and retaliation for demonstrative purposes only.
90. Any and all documents produced in response to trial subpoenas of Plaintiff or Defendant.
91. Any and all exhibits listed by Defendant.
92. Any documents for purposes of rebuttal or impeachment.

Respectfully submitted,

/s/ Alicia K. Haynes
Alicia K. Haynes
Attorney for Plaintiff

OF COUNSEL:

HAYNES & HAYNES, P.C.
1600 Woodmere Drive
Birmingham, Alabama 35226
Phone: (205) 879-0377
Fax: (205) 879-3572
E-mail: akhaynes@haynes-haynes.com

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of January, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Jeffrey Allen Lee
Maynard, Cooper & Gale, P.C.
1901 Sixth Avenue North
2400 AmSouth/Harbert Plaza
Birmingham, AL 35203-2618

R. Jason D'cruz
Morris, Manning & Martin, LLP
1600 Atlanta Financial Center
3343 Peachtree Road, N.E.
Atlanta, GA 30326

/s/ Alicia K. Haynes
OF COUNSEL